

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division.

Media Break Away, LLC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:15cv970 (LOG/TCB)
)	
Qiu Haiji, <i>et al</i>)	
)	
Defendants.)	

Plaintiff's Motion for Entry of Default Judgment

Comes Now the Plaintiff, Media Break Away, LLC, (hereinafter Media Break Away), by counsel, and files this motion for default judgment pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, seeking judgment by default against the Defendant subject internet domain name HI.NET and in support thereof states as follows:

The Complaint in this matter was filed on July 29, 2015. On August 6, 2015 this Court entered an Order directing publication of notice pursuant to the Anti-Cybersquatting Protection Act, 15 U.S.C. 1125(d)(2)(A)ii)(II)(bb). On August 13, 2015 proof of publication was filed with this Court as document 6.

On September 3, 2015 default was entered by the Clerk of this Court. Because the defendant domain HI.NET is now in default, the well-plead allegations of the Complaint should be taken as true.

Wherefore, Plaintiff Media Break Away submits that it is entitled to the *in rem* relief prayed for in the complaint and requests that this Court enter judgment in its favor as to the subject domain name HI.NET and that said domain name be transferred to the Plaintiff, either through the auspices of the appropriate domain name registrar or through modification of the zone record controlled by the appropriate registry.

The Plaintiff further requests that the ultimate judgment order include language to the following effect:

It is hereby Ordered, as further relief in this matter that the Registry of Record, being Verisign, Affilias, or some other Registry, shall promptly change the registrar for the domain name HI.NET as directed by Plaintiff's Counsel; and it is further

Ordered that the registrar of the domains name HI.NET shall place the referenced domain names in the account as directed by the Plaintiff's Counsel.

The Plaintiff further requests that the remaining claims asserted in the complaint be dismissed without prejudice.

Date: September 4, 2015

Respectfully Submitted,
Media Break Away, LLC
By Counsel

/s

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